

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney  
MICHELLE LO (NYRN 4325163)  
Chief, Civil Division  
JEVECHIUS D. BERNARDONI (CABN 281892)  
Assistant United States Attorney

1301 Clay Street, Suite 340S  
Oakland, California 94612-5217  
Telephone: (510) 637-3721  
Facsimile: (510) 637-3724  
jevechius.bernardoni@usdoj.gov

## Attorneys for Federal Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

TRANSGENDER LAW CENTER, *et al.*,

Case No. 3:19-cv-03032 SK

Plaintiffs,

## JOINT STATUS REPORT

v.  
UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT, *et al.*

## Defendants.

The Honorable Sallie Kim

### The Honorable Sallie Kim

The Honorable Sallie Kim

Pursuant to Court order (ECF No. 88), the parties jointly submit this Status Report. The parties have been working cooperatively to resolve this case. Specifically, on February 8, 2023, the parties agreed upon an ESI search protocol for Defendants' supplemental searches, which Defendants have implemented. Defendants are processing the resulting records. Plaintiffs and Defendants have been cooperating to narrow the scope of potentially responsive records for review. CRCL made supplemental productions on May 31, 2023, June 30, 2023, July, 31, 2023, and September 30, 2023. On April 12, 2023, May 1, 2023, June 1, 2023, June 29, 2023, and August 31, 2023, ICE made supplemental productions of records pursuant to the agreed-upon protocol. On July 20, 2023, DHS's Office of Inspector General made one supplemental production referred by ICE. Defendant, CRCL has approximately 3,800 pages of potentially

1 responsive records remaining to process, and ICE has approximately 4,500 pages of potentially responsive  
2 records remaining to process.

3 In light of the progress made to date in this case, the parties' intention to resolve their disputes  
4 cooperatively wherever possible, and the fact that there are presently no disputes ripe for judicial  
5 intervention, subject to Court approval, the parties suggest that they file a joint status report on or before  
6 March 18, 2024.

7 Respectfully submitted,

8 Dated: October 2, 2023

9 ISMAIL J. RAMSEY  
10 United States Attorney

11 /s/ Jevechius D. Bernardoni\*  
12 Jevechius D. Bernardoni  
13 Assistant United States Attorney

14 /s/ Irene R. Lax

15 Irene R. Lax  
16 Grant & Eisenhofer PA  
17 485 Lexington Ave., 29<sup>th</sup> Floor  
18 New York, NY 10017  
19 646-722-8512  
20 ilax@gelaw.com  
21 *Pro Hac Vice*

22 Mary Elizabeth Graham  
23 Grant & Eisenhofer PA  
24 2325 3<sup>rd</sup> St., Suite 329  
25 San Francisco, CA 94107  
26 (415) 293-8210  
27 egraham@gelaw.com

28 \*In compliance with Civil Local Rule 5-1(h)(3), the filer of this document attests under penalty of  
perjury that all other signatories have concurred in the filing of this document.